

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

---

In re:

LOONEY RICKS KISS ARCHITECTS, INC. Case No. 10-22034-JDL  
Chapter 11  
Debtor.

---

**DEBTOR'S OBJECTION TO MOTION OF VILLAS OF ST. JOHNS LLC FOR RELIEF  
FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)(1)**

---

Comes now Looney Ricks Kiss Architects, Inc. ("LRK" or "Debtor") and files this Objection to Motion of Villas St. Johns LLC for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) ("Motion") (Docket No. 138) which is set for hearing on May 12, 2010 and in support thereof would show unto the Court as follows:

1. Debtor admits the jurisdictional and background facts asserted in Paragraphs 1 through 7 of the Motion.
2. Debtor is vigorously defending the claims and is represented by its errors and omissions insurance carrier. The errors and omissions policy is a declining limits policy. The Debtor would show that the continued litigation of this matter will reduce the amount available for any potential liability as to this claimant and other potential claimants. Debtor asserts there is at least one other claim against the errors and omissions policy.
3. Debtor would be prejudiced by litigation going forward at this time. Debtor would incur expenses of deposition, travel, and the interference of the litigation with the ongoing reorganization process and sale process.

4. The Debtor would show that the stay should remain in effect at least through the confirmation of a Plan so that the Debtor may apply all resources to the reorganization efforts. This is particularly true since movant only seeks to proceed against insurance coverage at this time.

5. Debtor reserves the right to revise its objection and raise additional grounds at the hearing on this matter.

WHEREFORE PREMISES CONSIDERED, Looney Ricks Kiss Architects, Inc. seeks an order of this Court denying the Motion and for such other and further relief to which it may be entitled.

Respectfully submitted,

HARRIS SHELTON HANOVER WALSH, PLLC

BY: /s/ John L. Ryder  
John L. Ryder (Tenn. Disc. No. 08258)  
Steven N. Douglass (Tenn. Disc. No. 09770)  
2700 One Commerce Square  
Memphis, Tennessee 38103-2555  
(901) 525-1455  
jryder@harrisshelton.com

Counsel to the Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of May 2010, a copy of the foregoing electronically filed Motion and any exhibit attached thereto was served via U.S. mail, postage prepaid or electronic mail upon the United States Trustee, the United States Attorney; David Blaylock, Esq. One Commerce Square, Suite 1700, Memphis, TN 38103; Christopher J. Weiss, Esq., 200 South Orange Avenue, Suite 2600, Orlando, FL 32801; all parties who have requested to receive notice in this case; and on all parties listed on the List of 20 Largest Unsecured Creditors for Looney Ricks Kiss Architects, Inc.

/s/John L. Ryder  
John L. Ryder